

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

In Re:)	
)	
FORESIGHT ENERGY, LP, et al)	Case No. 20-41308
)	Chapter 11
)	
)	
Debtors.)	
)	
)	

**VERIFIED MOTION OF AMY A. ZUCCARELLO FOR
ADMISSION PRO HAC VICE**

Pursuant to the Local Rules of the United States Bankruptcy Court for the Eastern District of Missouri, and Rule 12.01(F) of the Local Rules of the United States District Court for the Eastern District of Missouri, AMY A. ZUCCARELLO of the firm Sullivan & Worcester, together with Marshall C. Turner of the firm Husch Blackwell LLP, and move for admission of AMY A. ZUCCARELLO *pro hac vice* in the above-captioned chapter 11 case, and in support thereof state as follows:

1. AMY A. ZUCCARELLO is an attorney in the law firm of Sullivan & Worcester, One Post Office Square, Boston, MA 02109. Her phone number is 617-338-2988. Her facsimile number is 617-338-2880 and email is azuccarello@sullivanlaw.com.

2. Ms. Zuccarello is a graduate of Boston College Law School, 2001. Ms. Zuccarello was admitted to the Bar of the Commonwealth of Massachusetts in January 2002. She is also admitted to practice before the U.S. District Court, Massachusetts; U.S. Court of Appeals, 1st Circuit; and U.S. Court of Appeals, 5th Circuit.

3. Ms. Zuccarello is a member in good standing of all bars of which she is a member and she is not under suspension or disbarment from any bar.

4. Ms. Zuccarello does not reside in the Eastern District of Missouri, is not regularly employed in the Eastern District of Missouri, and is not regularly engaged in the practice of law in the Eastern District of Missouri.

5. Ms. Zuccarello will represent creditor Lord Securities Corporation, in its capacity as First Lien Term Loan Agent and Collateral Trustee, in this matter and co-counsel in this matter is Marshall C. Turner, a member in good standing of the Bar for the U.S. District Court for the Eastern District of Missouri.

WHEREFORE, AMY A. ZUCCARELLO attests under penalty of perjury to the truth and accuracy of the foregoing facts, and respectfully requests that this motion be granted and that she be admitted *pro hac vice* in connection with the above-captioned case, and for such other and further relief as is just.

Dated: March 16, 2020
Boston, MA

/s/ Amy A. Zuccarello

Amy A. Zuccarello
Sullivan & Worcester LLP
One Post Office Square
Boston, MA 02109
Phone: (617) 338-2988
Email: azuccarello@sullivanlaw.com.

Respectfully submitted,

HUSCH BLACKWELL LLP

By: /s/ Marshall C. Turner

Marshall C. Turner, Esq. (#58053MO)

190 Carondelet Plaza, Suite 600

St. Louis, Missouri 63105

Telephone: (314) 480-1768

Facsimile: (314) 480-1505

marshall.turner@huschblackwell.com

Attorneys for Lord Securities Corporation

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Motion was filed on March 16, 2020 and that a true and correct copy of the Motion was served through this Court's CM/ECF system to all parties receiving notice thereby.

/s/ Marshall C. Turner

Marshall C. Turner